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Filing date: **09/14/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91197089
Party	Plaintiff Los Angeles Dodgers, LLC
Correspondence Address	DON M OBERT COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036-6799 UNITED STATES sis@cll.com, trademark@cll.com, jmn@cll.com, mlk@cll.com, dmo@cll.com, rsm@cll.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Lindsay M. Rodman
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Signature	/Lindsay Rodman/
Date	09/14/2015
Attachments	BROOKLYN BURGER Motion to Suspend 9.14.15.pdf(101702 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 77/750,645
Filed: June 3, 2009
For Mark: BROOKLYN BURGER (Stylized)
Published in the Official Gazette: April 27, 2010

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LOS ANGELES DODGERS, LLC,	:
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Opposer,	:
	:
v.	:
	:
	Opposition No. 91197089
	:
A. STEIN MEAT PRODUCTS, INC.,	:
	:
Applicant.	:
	:
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MOTION ON CONSENT TO EXTEND DEADLINES

Opposer, with the consent of Applicant's counsel, hereby requests that the Deadline for Initial Disclosures and all remaining dates be extended for sixty (60) days.

Since the last extension, substantial progress has been made towards a resolution of this matter. Specifically, on July 10, 2015, Opposer's outside counsel e-mailed Applicant's counsel revisions to the settlement agreement. On July 15, 2015, the parties' outside counsels communicated via e-mail regarding clarification to a specific term in the settlement agreement. On July 31, 2015, Opposer's outside counsel e-mailed Applicant's counsel regarding the settlement agreement. On August 3, 2015, Applicant's counsel e-mailed Opposer's outside counsel written comments to the settlement agreement. That same day Opposer's outside counsel sent Applicant's written comments to the agreement to Opposer's in-house counsel. Then on

August 5, 2015, Opposer's in-house counsel provided Opposer's outside counsel with additional written comments to the settlement agreement. That same day, Opposer's outside counsel forwarded via e-mail the revised agreement to Applicant's counsel. Thereafter, the parties agreed to the final terms of the settlement agreement. On August 24, 2015, Opposer's outside counsel sent execution copies via FedEx courier to Applicant's counsel.

The parties respectfully request an additional sixty (60) day extension of the deadlines to allow for the parties to execute the settlement agreement and to file the motions contained within the settlement agreement. The parties respectfully request that the deadlines be extended as follows:

Initial Disclosures Due:	11/14/2015
Expert Disclosures Due :	3/13/2016
Discovery Period to Close :	4/12/2016
Plaintiff Pretrial Disclosures :	5/28/2016
Plaintiff's 30-day Trial Period Ends :	7/11/2016
Defendant/Counterclaim Plaintiff's Pretrial Disclosures :	7/26/2016
30-day Trial Period for Defendant and Plaintiff in the Counterclaim :	9/9/2016
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due :	9/24/2016
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends:	11/8/2016
Counterclaim Plaintiff's Rebuttal Disclosures Due:	11/23/2016
15-day Rebuttal Period for Counterclaim Plaintiff Ends :	12/23/2016
Plaintiff's Trial Brief Due :	2/21/2017
Defendant's Trial Brief and Plaintiff in the Counterclaim Due :	2/23/2017
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due :	4/22/2017
Reply Brief, if any, for Plaintiff in the Counterclaim Due :	5/7/2017

If the Board grants this motion, the Board should reset the trial periods and other periods as outlined above.

Dated: New York, New York
September 14, 2015

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Lindsay Rodman/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on September 14, 2015, I caused a true and correct copy of the foregoing Motion On Consent To Suspend And To Extend Discovery Period If Opposition Is Resumed to be sent via First Class Mail, postage prepaid, to Applicant's Attorney and Correspondent of Record, Robert T. Maldonado, Esq., Cooper & Dunham LLP, 30 Rockefeller Plaza, New York, New York 10012.

New York, New York
Dated: September 14, 2015

/Lindsay Rodman/
Lindsay M. Rodman